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21 Attorneys for Plaintiff Angela Evans

22 **UNITED STATES DISTRICT COURT**

23 **DISTRICT OF NEVADA**

24 ANGELA EVANS, an individual;

25 Case No.: 2:20-CV-00986-RFB-VCF

Plaintiff,

vs.

26 VALLEY ELECTRIC ASSOCIATION,
27 INC.; DOES I through X; and ROE
Corporations XI through XX, inclusive,

Defendant.

28 ANGELA EVANS, individually

Case No.: 2:20-CV-01919-APG-DJA

Plaintiff,

v.

29 NYE COUNTY SHERIFF'S OFFICE, a
30 political subdivision of the State of
31 Nevada; DAVID BORUCHOWITZ,
32 individually,

33 **STIPULATION AND ORDER TO EXTEND
34 DEADLINE FOR PLAINTIFF TO RESPOND
35 TO DEFENDANT VALLEY ELECTRIC
36 ASSOCIATION, INC.'S MOTION FOR
37 SUMMARY JUDGMENT (ECF No. 80)**

38 Defendant.

1 **STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF TO**
2 **RESPOND TO DEFENDANT VALLEY ELECTRIC ASSOCIATION, INC.'S MOTION**
3 **FOR SUMMARY JUDGMENT (ECF No. 80)**

4 The parties in Case No. 2:20-CV-00986-RFB-VCF by and through their
5 respective attorneys of record, hereby stipulate to a thirty (30) day extension through
6 January 10, 2022 (January 9, 2022 falls on a Sunday) for Plaintiff Angela Evans
7 ("Plaintiff") to respond to Defendant Valley Electric Association, Inc.'s ("Defendant VEA")
8 Motion for Summary Judgment (ECF No. 80).

9 Defendant VEA filed its Motion for Summary Judgment (ECF No. 80) on
10 November 19, 2021. Plaintiff's response is currently due on December 10, 2021. Plaintiff
11 has requested the extension and Defendant VEA has agreed to the request.

12 Good cause exceedingly exists for such extension. Unfortunately, Plaintiff's trial
13 counsel's immediate family member suffered a medical emergency, requiring intubation.
14 Such individual remains under supervised care, and unfortunately has very recently
15 received an unfavorable diagnosis. This family emergency has necessarily required a
16 great deal of Plaintiff's trial counsel's time and attention. Further, Plaintiff's Texas-based
17 counsel is set for trial during the interim period prior to the current response deadline.

18 Accordingly, the parties in Case No. 2:20-CV-00986-RFB-VCF agree that
19 Plaintiff's response to Defendant VEA Motion for Summary Judgment (ECF No. 80) shall
20 be due on January 10, 2022.

21 ///

1 This request is not sought for any improper purpose or other reason of delay. No
2 party is prejudiced by the requested extension.

3 **IT IS SO STIPULATED.**

4 Dated: November 24, 2021

Dated: November 24, 2021

5 Respectfully submitted,

6 Respectfully submitted,

7 /s/ Christian Gabroy

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GABROY LAW OFFICES

7 /s/ Shannon S. Pierce

Shannon S. Pierce, Esq. (#12471)
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Attorneys for Defendant Valley Electric

10 Elizabeth Sanford, Esq. (*Pro Hac Vice*)
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Association, Inc. in Case No. 2:20-cv-00986-
RFB-VC

11 *Attorneys for Plaintiff Angela Evans in*
12 *Case No. 2:20-CV-00986-RFB-VCF*

14 **IT IS SO ORDERED.**



15

RICHARD E. BOULWARE, II
United States District Court

16 DATED this 24th day of November, 2021.